

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER  
DISASTER SITE LITIGATION

21 MC 102 (AKH)

DOCKET NO. 06-CV-01521-AKH

NOTICE OF DEPOSITION UPON ORAL  
EXAMINATION

**PLEASE TAKE NOTICE**, that pursuant to Fed. R. Civ. P. 30, the Defendants' Liaison Counsel and Defendants will conduct depositions upon oral examination of Sanford Alper, a non-party fact witness, in the above-captioned lawsuit, before a notary public or other officer authorized by law to administer oaths, at 4:00 p.m. on the 29th day of October, 2013, at Day Pitney LLP, 7 Times Square, New York, New York 10036, and on any adjourned date thereof, and from day to day thereafter until completed. You are invited to attend and cross-examine; and

**PLEASE TAKE FURTHER NOTICE**, that pursuant to Fed. R. Civ. P. 34, Defendants have requested that Mr. Alper produce for inspection and copying all documents and things in response to the requests set forth in the subpoena attached hereto at a time and place mutually agreeable to counsel prior to the depositions; and

**PLEASE TAKE FURTHER NOTICE** that the deposition may be videotaped.

Dated: New York, New York  
October 21, 2013

**DAY PITNEY LLP**

By:       /s/ Benjamin E. Haglund        
Benjamin E. Haglund  
A Member of the Firm

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On behalf of the Defense Liaison Committee for  
Defendants in the 21 MC 102 and 21 MC 103  
Dockets and as Attorneys for Defendant  
Deutsche Bank Trust Company Americas  
Deutsche Bank Trust Corporation  
DB Private Clients Corporation  
DBAB Wall Street LLC